

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NEW YORK

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BLACK LOVE RESISTS IN THE RUST by and
through its Co-Directors NATASHA SOTO and
SHAKETA REDDEN and on behalf of its mem-
bers; DORETHEA FRANKLIN; TANQUA
SIMMONS; DE’JON HALL; and JANE DOE, in-
dividually and on behalf of a class of all others sim-
ilarly situated;

Plaintiffs,

**Case No. 1:18-cv-00719-CCR
JUDGE REISS**

- VS -

CITY OF BUFFALO, N.Y.; BYRON B. BROWN,
Mayor of the City of Buffalo, in his individual and
official capacities; BYRON C. LOCKWOOD,
Commissioner of the Buffalo Police Department, in
his individual and official capacities; DANIEL
DERENDA, former Commissioner of the Buffalo
Police Department, in his individual capacity;
AARON YOUNG, KEVIN BRINKWORTH,
PHILIP SERAFINI, ROBBIN THOMAS,
UNKNOWN SUPERVISORY PERSONNEL 1-10,
UNKNOWN OFFICERS 1-20, each officers of the
Buffalo Police Department, in their individual ca-
pacities.

Defendants.

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MOTION TO WITHDRAW AS COUNSEL

Pursuant to Rule 83.2(c) of the Local Rules of the United States District Court for
the Western District of New York, Plaintiffs Black Love Resists in the Rust (“Black Love Re-
sists” or “BLRR”) and individual plaintiffs and class representatives, Dorethea Franklin, Taniqua
Simmons, De’Jon Hall, and Jane Doe, by and through counsel, respectfully move the Court to
allow Travis England, Esq. to withdraw as counsel of record in the above-captioned proceeding.

Mr. England is leaving the employment of the National Center for Law and Economic Justice (NCLEJ), effective March 18. No party will be prejudiced or otherwise affected by his withdrawal, as Britney Wilson and Claudia Wilner, both of whom remain associated with NCLEJ, will remain as counsel for plaintiffs, in addition to co-counsel from the Center for Constitutional Rights, and the Western New York Law Center.

Dated: March 18, 2020

Respectfully submitted,

/s/ Travis England
Travis W. England
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